

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

DANIELLE HARRIS,)	
)	
Plaintiff,)	Civil Action File No.
vs.)	1:20-cv-00297-MHC
)	
THE BUREAUS, Inc. a foreign)	
corporation,)	
)	
Defendant.)	
_____)	

DECLARATION OF JONATHAN K. AUST

Pursuant to 28 U.S.C. § 1746, I declare under penalty of perjury that the following statements are true and correct to the best of my personal knowledge:

1.

I, Jonathan K. Aust, am a resident of the State of Georgia and am over 18 years of age, and I am competent to testify to the statements set forth in this Affidavit. This Affidavit is based upon my own personal knowledge and if called upon to testify, the content of this Affidavit would be my testimony as to the things stated herein. I give this Affidavit in support of Defendant The Bureau’s Inc.’s (the “Bureaus”) motion for attorney’s fees and for all other purposes permitted by law.

2.

I have personally handled, researched, drafted pleadings and motions, conducted discovery and took Plaintiff's deposition in this litigation on behalf of the Bureaus.

3.

I am admitted to practice law in the State of Georgia and the State of North Carolina. In those states I am admitted in both the state and federal courts.

4.

I have been practicing law since 2009 almost exclusively representing creditors, debt collectors and debt buyers in litigation relating to the Fair Debt Collection Practices Act ("FDCPA"), 15 U.S.C. § 1692 *et seq.*, the Fair Credit Reporting Act, ("FCRA"), 15 U.S.C. § 1681 *et seq.*, and the Telephone Consumer Protection Act ("TCPA"), 47 U.S.C. § 227 *et seq.*

5.

I have extensive experience in defending individual and class action consumer law cases.

6.

Since being admitted to this court in 2010, I have appeared as an attorney of record in more than 220 cases.

7.

I spent 70.4 hours defending this matter on behalf of the Bureaus.

8.

My hourly billing rate is \$265.00/ hour.

9.

Attached hereto as Exhibits A, B and C are true and correct copies of my firm's billing records for this matter.

10.

I billed Defendant for attorney services in defending this matter in the total amount of \$18,656.00.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct to the best of my knowledge and information.

Dated this 24th day of March 2021.

/s/ Jonathan K. Aust
Jonathan K. Aust
Georgia Bar No. 448584
Counsel for Defendant

EXHIBIT

“A”

Bedard Law Group, P.C.

4855 River Green Parkway

Suite 310

Duluth, GA 30096

Telephone: 678-253-1871

EIN: 27-0691948

March 1, 2020

Invoice No. 26974

Aristotle Sangalang

The Bureaus, Inc.

Evanston, IL 60201

Client Number: SANAA000MQ Aristotle Sangalang

Matter Number: 4580 The Bureaus, Inc. v. Harris, Danielle

For Services Rendered Through 3/1/2020.**Fees**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/20/2020	JA	Review/analyze complaint.	0.30	\$79.50
02/21/2020	JA	Review/analyze client documents.	0.30	\$79.50
02/21/2020	JA	Attempted telephone conference with client re: facts of case. Left message to call.	0.10	\$0.00 N/C
02/21/2020	JA	Telephone conference with client re: facts and strategy.	0.70	\$185.50
02/21/2020	JA	Draft/revise release. Draft/revise memo to client re: same.	0.20	\$53.00
02/24/2020	JA	Review/analyze memo from client re: release edits. Draft/revise memo to client re: same.	0.10	\$26.50
02/25/2020	JA	Review/analyze memo from client re: settlement. Draft/revise memo to client re: same.	0.10	\$26.50
02/25/2020	JA	Draft/revise memo to opposing counsel re: settlement.	0.10	\$26.50
02/27/2020	JA	Draft/revise memo to client re: settlement and answer.	0.10	\$26.50
02/27/2020	JA	Draft/revise answer and corporate disclosure statement.	0.90	\$238.50
Billable Hours / Fees:			2.80	\$742.00

Continued On Next Page

Client Number: SANAA000MQ
Matter Number: 4580

03/01/2020
Page: 2

Timekeeper Summary

Timekeeper JA worked 2.80 hours at \$265.00 per hour, totaling \$742.00.

Timekeeper JA worked 0.10 hours at no charge.

Prior Balance:	\$0.00
Payments Received:	\$0.00
Current Fees:	\$742.00
Advanced Costs:	\$0.00
TOTAL AMOUNT DUE:	\$742.00

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.
Please call John H. Bedard, Jr. with any questions
you may have. 678-253-1871ext. 244

Bedard Law Group, P.C.

4855 River Green Parkway

Suite 310

Duluth, GA 30096

Telephone: 678-253-1871

EIN: 27-0691948

April 1, 2020

Invoice No. 27127

Aristotle Sangalang

The Bureaus, Inc.

Evanston, IL 60201

Client Number: SANAA000MQ Aristotle Sangalang

Matter Number: 4580 The Bureaus, Inc. v. Harris, Danielle

For Services Rendered Through 4/1/2020.**Fees**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
03/23/2020	JA	Review/analyze Court's Order re COVID-19.	0.10	\$26.50
03/25/2020	JA	Draft/revise memo to opposing counsel re: joint preliminary report and rule 26 conference.	0.10	\$26.50
03/25/2020	JA	Review/analyze client documents.	0.20	\$53.00
03/25/2020	JA	Draft/revise initial disclosures.	0.30	\$79.50
03/25/2020	JA	Draft/revise memo to client re: initial disclosures and discovery.	0.10	\$26.50
03/26/2020	JA	Review/analyze memo from client re: initial disclosures. Draft/revise memo to client re: discovery.	0.10	\$26.50
03/27/2020	JA	Draft/revise initial disclosures.	0.10	\$26.50
03/27/2020	JA	Telephone conference with opposing counsel re: Rule 26 Conference.	0.10	\$26.50
03/30/2020	JA	Draft/revise joint preliminary report.	0.30	\$79.50
Billable Hours / Fees:			1.40	\$371.00

Timekeeper Summary

Timekeeper JA worked 1.40 hours at \$265.00 per hour, totaling \$371.00.

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Client Number: SANAA000MQ
Matter Number: 4580

04/01/2020
Page: 2

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
03/22/2020	Check Number 56326 against Inv# 26974	(\$742.00)
Total Payments Received:		(\$742.00)

Prior Balance:	\$742.00	Last Payment:	03/22/2020
Payments Received:	(\$742.00)		
Current Fees:	\$371.00		
Advanced Costs:	\$0.00		
TOTAL AMOUNT DUE:	\$371.00		

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EIN: 27-0691948

May 1, 2020

Invoice No. 27283

Aristotle Sangalang

The Bureaus, Inc.

Evanston, IL 60201

Client Number: SANAA000MQ Aristotle Sangalang

Matter Number: 4580 The Bureaus, Inc. v. Harris, Danielle

For Services Rendered Through 5/1/2020.**Fees**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
04/02/2020	JA	Review/analyze [10] Scheduling Order.	0.10	\$26.50
04/17/2020	JA	Review/analyze plaintiff's first set of discovery requests. Draft/revise memo to client re: same.	0.10	\$26.50
04/22/2020	JA	Draft/revise discovery responses.	0.50	\$132.50
04/22/2020	JA	Draft/revise discovery requests.	0.40	\$106.00
04/23/2020	JA	Review/analyze memo from opposing counsel re: discovery. Draft/revise memo to opposing counsel re: same.	0.10	\$26.50
Billable Hours / Fees:			1.20	\$318.00

Timekeeper Summary

Timekeeper JA worked 1.20 hours at \$265.00 per hour, totaling \$318.00.

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
04/17/2020	Check Number 56453 against Inv# 27127	(\$371.00)
Total Payments Received:		(\$371.00)

Continued On Next Page

Client Number: SANAA000MQ
Matter Number: 4580

05/01/2020
Page: 2

Prior Balance:	\$371.00	Last Payment:	04/17/2020
Payments Received:	(\$371.00)		
Current Fees:	\$318.00		
Advanced Costs:	\$0.00		
TOTAL AMOUNT DUE:	\$318.00		

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4855 River Green Parkway

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Telephone: 678-253-1871

EIN: 27-0691948

June 1, 2020

Invoice No. 27457

Aristotle Sangalang

The Bureaus, Inc.

Evanston, IL 60201

Client Number: SANAA000MQ Aristotle Sangalang

Matter Number: 4580 The Bureaus, Inc. v. Harris, Danielle

For Services Rendered Through 6/1/2020.**Fees**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
05/13/2020	JA	Draft/revise memo to client re: discovery responses.	0.10	\$26.50
05/15/2020	JA	Telephone conference with client re: discovery responses.	0.40	\$106.00
05/15/2020	JA	Draft/revise discovery responses.	1.00	\$265.00
05/18/2020	JA	Draft/revise memo to client re: discovery responses.	0.10	\$26.50
05/18/2020	JA	Draft/revise discovery responses.	0.30	\$79.50
05/21/2020	JA	Review/analyze discovery responses.	0.30	\$79.50
05/27/2020	JA	Draft/revise memo to client re: plaintiff's discovery responses.	0.40	\$106.00

Billable Hours / Fees:**2.60****\$689.00****Timekeeper Summary**

Timekeeper JA worked 2.60 hours at \$265.00 per hour, totaling \$689.00.

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Client Number: SANAA000MQ
 Matter Number: 4580

06/01/2020
 Page: 2

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
05/20/2020	Check Number 56587 against Inv# 27283	(\$318.00)
Total Payments Received:		(\$318.00)

Prior Balance:	\$318.00	Last Payment:	05/20/2020
Payments Received:	(\$318.00)		
Current Fees:	\$689.00		
Advanced Costs:	\$0.00		
TOTAL AMOUNT DUE:	\$689.00		

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Bedard Law Group, P.C.

4855 River Green Parkway

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Duluth, GA 30096

Telephone: 678-253-1871

EIN: 27-0691948

July 1, 2020

Invoice No. 27607

Aristotle Sangalang

The Bureaus, Inc.

Evanston, IL 60201

Client Number: SANAA000MQ Aristotle Sangalang

Matter Number: 4580 The Bureaus, Inc. v. Harris, Danielle

For Services Rendered Through 7/1/2020.**Fees**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
06/04/2020	JA	Review/analyze r [REDACTED] [REDACTED]	0.60	\$159.00
06/04/2020	JA	Draft/revise memo to client re: [REDACTED] [REDACTED]	0.20	\$53.00
06/22/2020	JA	Review/analyze plaintiff's discovery responses.	0.10	\$26.50
06/22/2020	JA	Draft/revise memo to opposing counsel re: deposition.	0.10	\$26.50
Billable Hours / Fees:			1.00	\$265.00

Timekeeper Summary

Timekeeper JA worked 1.00 hours at \$265.00 per hour, totaling \$265.00.

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
06/23/2020	Check Number 56687 against Inv# 27457	(\$689.00)
Total Payments Received:		(\$689.00)

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Client Number: SANAA000MQ
Matter Number: 4580

07/01/2020
Page: 2

Prior Balance:	\$689.00	Last Payment:	06/23/2020
Payments Received:	(\$689.00)		
Current Fees:	\$265.00		
Advanced Costs:	\$0.00		
TOTAL AMOUNT DUE:	\$265.00		

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.
Please call John H. Bedard, Jr. with any questions
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Bedard Law Group, P.C.

4855 River Green Parkway

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Duluth, GA 30096


Telephone: 678-253-1871

EIN: 27-0691948

August 1, 2020

Invoice No. 27781

Aristotle Sangalang


 Evanston, IL 60201

Client Number: SANAA000MQ Aristotle Sangalang

Matter Number: 4580 The Bureaus, Inc. v. Harris, Danielle

For Services Rendered Through 8/1/2020.**Fees**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
07/13/2020	JA	Review/analyze memo from opposing counsel re: plaintiff's deposition. Draft/revise memo to opposing counsel re: same.	0.10	\$26.50
07/14/2020	JA	Review/analyze memo from opposing counsel re: deposition. Draft/revise memo to client re: same.	0.10	\$26.50
07/14/2020	JA	Review/analyze memo from opposing counsel re: deposition. Draft/revise memo to opposing counsel re: same.	0.10	\$26.50
07/16/2020	JA	Draft/revise memo to opposing counsel re: deposition.	0.10	\$26.50
07/17/2020	JA	Draft/revise memo to opposing counsel re: plaintiff's deposition.	0.10	\$26.50
07/17/2020	JA	Telephone conference with client re: depositions.	0.30	\$79.50
07/17/2020	JA	Telephone conference with court reporter remote deposition.	0.40	\$0.00 N/C
07/17/2020	JA	Draft/revise notice of plaintiff's deposition.	0.30	\$79.50
07/19/2020	JA	Draft/revise plaintiff deposition outline.	3.20	\$848.00
07/20/2020	JA	Attend deposition of plaintiff.	2.00	\$530.00
07/20/2020	JA	Review/analyze documents to prepare for plaintiff's deposition.	0.60	\$159.00
07/20/2020	JA	Draft/revise memo to client re: amended discovery responses and plaintiff's deposition.	0.30	\$79.50

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Client Number: SANAA000MQ
 Matter Number: 4580

08/01/2020
 Page: 2

07/20/2020	JA	Draft/revise amended discovery responses.	1.00	\$265.00
07/20/2020	JA	Telephone conference with client re: plaintiff's deposition.	0.30	\$79.50
07/21/2020	JA	Review/analyze memo from client re: discovery responses. Draft/revise memo to client re: same.	0.10	\$26.50
07/21/2020	JA	Draft/revise amended discovery responses.	0.30	\$79.50
			Billable Hours / Fees:	8.90 \$2,358.50

Timekeeper Summary

Timekeeper JA worked 8.90 hours at \$265.00 per hour, totaling \$2,358.50.

Timekeeper JA worked 0.40 hours at no charge.

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
07/19/2020	Check Number 56787 against Inv# 27607	(\$265.00)
Total Payments Received:		(\$265.00)

Prior Balance:	\$265.00	Last Payment:	07/19/2020
Payments Received:	(\$265.00)		
Current Fees:	\$2,358.50		
Advanced Costs:	\$0.00		
TOTAL AMOUNT DUE:	\$2,358.50		

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 Please call John H. Bedard, Jr. with any questions
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Bedard Law Group, P.C.

4855 River Green Parkway

Suite 310

Duluth, GA 30096

Telephone: 678-253-1871

EIN: 27-0691948

September 1, 2020

Invoice No. 27933

Aristotle Sangalang

The Bureaus, Inc.

Evanston, IL 60201

Client Number: SANAA000MQ Aristotle Sangalang

Matter Number: 4580 The Bureaus, Inc. v. Harris, Danielle

For Services Rendered Through 9/1/2020.**Fees**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
08/04/2020	JA	Review/analyze memo from court reporter re: exhibits. Draft/revise memo to court reporter re: same.	0.10	\$26.50
08/06/2020	JA	Review/analyze plaintiff's deposition transcript.	0.80	\$212.00
08/06/2020	JA	Draft/revise memo to client re: summary judgment and deposition transcript.	0.30	\$79.50
08/06/2020	JA	Review/analyze memo from client re: consumer debt. Draft/revise memo to client re: same.	0.10	\$26.50
08/16/2020	JA	Draft/revise statement of undisputed material facts.	2.00	\$530.00
08/17/2020	JA	Draft/revise motion for summary judgment.	2.10	\$556.50
08/18/2020	JA	Draft/revise motion for summary judgment.	1.40	\$371.00
08/24/2020	JA	Telephone conference with client re: summary judgment.	0.30	\$79.50
08/24/2020	JA	Research case law re: standing argument.	0.90	\$238.50
08/24/2020	JA	Draft/revise motion for summary judgment.	1.50	\$397.50
08/25/2020	JA	Conference with D. Kleber re: standing cases in the 11th Circuit.	0.50	\$0.00 N/C
08/25/2020	JA	Draft/revise client declaration for motion for summary judgment.	1.40	\$371.00

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Client Number: SANAA000MQ
 Matter Number: 4580

09/01/2020

Page: 2

08/25/2020	JA	Draft/revise motion for summary judgment.	1.90	\$503.50
08/26/2020	JA	Draft/revise motion for summary judgment.	6.20	\$1,643.00
			<hr/>	<hr/>
Billable Hours / Fees:			19.00	\$5,035.00

Timekeeper Summary

Timekeeper JA worked 19.00 hours at \$265.00 per hour, totaling \$5,035.00.

Timekeeper JA worked 0.50 hours at no charge.

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
08/22/2020	Check Number 56938 against Inv# 27781	(\$2,358.50)
Total Payments Received:		<hr/> (\$2,358.50)

Prior Balance:	\$2,358.50	Last Payment:	08/22/2020
Payments Received:	(\$2,358.50)		
Current Fees:	\$5,035.00		
Advanced Costs:	<hr/> \$0.00		
TOTAL AMOUNT DUE:	\$5,035.00		

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Bedard Law Group, P.C.

4855 River Green Parkway

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Duluth, GA 30096

Telephone: 678-253-1871

EIN: 27-0691948

October 1, 2020

Invoice No. 28113

Aristotle Sangalang

The Bureaus, Inc.

Evanston, IL 60201

Client Number: SANAA000MQ Aristotle Sangalang

Matter Number: 4580 The Bureaus, Inc. v. Harris, Danielle

For Services Rendered Through 10/1/2020.**Fees**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>	
09/16/2020	JA	Attempted telephone conference with client re: plaintiff's dismissal request. Left message to call.	0.10	\$0.00	N/C
09/16/2020	JA	Telephone conference with client re: dismissal request.	0.50	\$132.50	
09/16/2020	JA	Conference with M. Chapman re: judgment in other Gary Nitzkin case.	0.30	\$0.00	N/C
09/16/2020	JA	Review/analyze memo from opposing counsel re: dismissal. Draft/revise memos to client and opposing counsel re: same.	0.60	\$159.00	
09/17/2020	JA	Review/analyze plaintiff's response to summary judgment. Draft/revise memo to client re: same.	0.30	\$79.50	
09/22/2020	JA	Review/analyze plaintiff's response to summary judgment and motion to dismiss. Draft/revise memo to client re: same.	0.20	\$53.00	
09/30/2020	JA	Draft/revise reply brief in support of motion for summary judgment and response to motion to dismiss.	2.50	\$662.50	

Billable Hours / Fees:**4.10****\$1,086.50****Timekeeper Summary**

Timekeeper JA worked 4.10 hours at \$265.00 per hour, totaling \$1,086.50.

Timekeeper JA worked 0.40 hours at no charge.

Continued On Next Page

Client Number: SANAA000MQ
Matter Number: 4580

10/01/2020
Page: 2

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
09/12/2020	Check Number 57052 against Inv# 27933	(\$5,035.00)
Total Payments Received:		(\$5,035.00)

Prior Balance:	\$5,035.00	Last Payment:	09/12/2020
Payments Received:	(\$5,035.00)		
Current Fees:	\$1,086.50		
Advanced Costs:	\$0.00		
TOTAL AMOUNT DUE:	\$1,086.50		

Thank You for Letting Us Serve You.
Payment Due Upon Receipt.
Please call John H. Bedard, Jr. with any questions
you may have. 678-253-1871ext. 244

Bedard Law Group, P.C.

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Duluth, GA 30096

Telephone: 678-253-1871

EIN: 27-0691948

November 1, 2020

Invoice No. 28284

Aristotle Sangalang

The Bureaus, Inc.

Evanston, IL 60201

Client Number: SANAA000MQ Aristotle Sangalang

Matter Number: 4580 The Bureaus, Inc. v. Harris, Danielle

For Services Rendered Through 11/1/2020.**Fees**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
10/01/2020	JA	Draft/revise response to motion to dismiss.	0.40	\$106.00
10/01/2020	JA	Draft/revise memo to client re: reply and response briefs.	0.10	\$26.50
Billable Hours / Fees:			0.50	\$132.50

Timekeeper Summary

Timekeeper JA worked 0.50 hours at \$265.00 per hour, totaling \$132.50.

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
10/14/2020	Check Number 57223 against Inv# 28113	(\$1,086.50)
Total Payments Received:		(\$1,086.50)

Continued On Next Page

Client Number: SANAA000MQ
Matter Number: 4580

11/01/2020

Page: 2

Prior Balance:	\$1,086.50	Last Payment:	10/14/2020
Payments Received:	(\$1,086.50)		
Current Fees:	\$132.50		
Advanced Costs:	\$0.00		
TOTAL AMOUNT DUE:	\$132.50		

Thank You for Letting Us Serve You.
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Bedard Law Group, P.C.

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EIN: 27-0691948

January 1, 2021

Invoice No. 28586

Aristotle Sangalang

The Bureaus, Inc.

Evanston, IL 60201

Client Number: SANAA000MQ Aristotle Sangalang

Matter Number: 4580 The Bureaus, Inc. v. Harris, Danielle

For Services Rendered Through 1/1/2021.**Fees**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
12/01/2020	JA	Review/analyze notice of appearance of new counsel. Draft/revise memo to client re: same.	0.10	\$26.50
12/10/2020	JA	Review/analyze motion to withdraw as counsel. Draft/revise memo to client re: same.	0.10	\$26.50
12/18/2020	JA	Review/analyze memo from client re: motion to substitute counsel. Draft/revise memo to client re: same.	0.10	\$26.50
12/21/2020	JA	Review/analyze order on motion to withdraw as counsel. Draft/revise memo to client re: same.	0.10	\$26.50
12/29/2020	JA	Review/analyze magistrate judge's report and recommendation. Draft/revise memo to client re: same.	0.30	\$79.50
Billable Hours / Fees:			0.70	\$185.50

Timekeeper Summary

Timekeeper JA worked 0.70 hours at \$265.00 per hour, totaling \$185.50.

Continued On Next Page

Client Number: SANAA000MQ
Matter Number: 4580

01/01/2021
Page: 2

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
12/19/2020	Check Number 57453 against Inv# 28284	(\$132.50)
Total Payments Received:		(\$132.50)

Prior Balance:	\$132.50	Last Payment:	12/19/2020
Payments Received:	(\$132.50)		
Current Fees:	\$185.50		
Advanced Costs:	\$0.00		
TOTAL AMOUNT DUE:	\$185.50		

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4855 River Green Parkway

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Duluth, GA 30096

Telephone: 678-253-1871

EIN: 27-0691948

February 1, 2021

Invoice No. 28790

Aristotle Sangalang

The Bureaus, Inc.

Evanston, IL 60201

Client Number: SANAA000MQ Aristotle Sangalang

Matter Number: 4580 The Bureaus, Inc. v. Harris, Danielle

For Services Rendered Through 2/1/2021.**Fees**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
01/12/2021	JA	Review/analyze plaintiff's objection to the report and recommendation and motion for leave to amend. Draft/revise memo to client re: same.	0.30	\$79.50
01/15/2021	JA	Review/analyze court order re: motion for summary judgment. Draft/revise memo to client re: same.	0.30	\$79.50
01/26/2021	JA	Draft/revise memo to client re: status of case.	0.10	\$26.50
01/26/2021	JA	Telephone conference with client re: sanction motion.	0.40	\$106.00
01/28/2021	JA	Research case law re: bad faith motion for attorney's fees.	2.40	\$636.00

Billable Hours / Fees:**3.50****\$927.50****Timekeeper Summary**

Timekeeper JA worked 3.50 hours at \$265.00 per hour, totaling \$927.50.

Continued On Next Page

Client Number: SANAA000MQ
 Matter Number: 4580

02/01/2021
 Page: 2

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
01/16/2021	Check Number 57574 against Inv# 28586	(\$185.50)
Total Payments Received:		(\$185.50)

Prior Balance:	\$185.50	Last Payment:	01/16/2021
Payments Received:	(\$185.50)		
Current Fees:	\$927.50		
Advanced Costs:	\$0.00		
TOTAL AMOUNT DUE:	\$927.50		

Thank You for Letting Us Serve You.
 Payment Due Upon Receipt.
 Please call John H. Bedard, Jr. with any questions
 you may have. 678-253-1871ext. 244

Bedard Law Group, P.C.

4855 River Green Parkway

Suite 310

Duluth, GA 30096

Telephone: 678-253-1871

EIN: 27-0691948

March 1, 2021

Invoice No. 28966

Aristotle Sangalang

The Bureaus, Inc.

Evanston, IL 60201

Client Number: SANAA000MQ Aristotle Sangalang

Matter Number: 4580 The Bureaus, Inc. v. Harris, Danielle

For Services Rendered Through 3/1/2021.**Fees**

<u>Date</u>	<u>Timekeeper</u>	<u>Description</u>	<u>Hours</u>	<u>Amount</u>
02/01/2021	JA	Research case law in support of motion for attorneys fees.	0.60	\$159.00
02/01/2021	JA	Draft/revise motion for attorneys fees.	1.10	\$291.50
02/02/2021	JA	Draft/revise motion to attorney's fees.	3.30	\$874.50
02/03/2021	JA	Draft/revise memo to client re: request for attorney's fees from opposing counsel.	0.10	\$26.50
02/03/2021	JA	Research bad faith under the FDCPA.	0.50	\$132.50
02/03/2021	JA	Draft/revise motion for attorneys fees.	2.10	\$556.50
02/04/2021	JA	Draft/revise motion for attorney's fees.	3.60	\$954.00
02/11/2021	JA	Review/analyze dockets for number of cases filed by CRLA.	1.00	\$265.00
02/15/2021	JB	Draft/revise brief in support of motion for sanctions and costs.	1.50	\$517.50
02/15/2021	JA	Draft/revise bill of cost.	0.20	\$53.00
02/15/2021	JA	Draft/revise motion for sanctions.	1.50	\$397.50
02/16/2021	JA	Draft/revise bill of cost.	0.20	\$53.00
02/21/2021	JA	Draft/revise sanction motion.	0.20	\$53.00
02/22/2021	JA	Draft/revise motion for sanctions.	3.30	\$874.50

Continued On Next Page

Client Number: SANAA000MQ
 Matter Number: 4580

03/01/2021
 Page: 2

Billable Hours / Fees:	<u>19.20</u>	<u>\$5,208.00</u>
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Timekeeper Summary

Timekeeper JA worked 17.70 hours at \$265.00 per hour, totaling \$4,690.50.

Timekeeper JB worked 1.50 hours at \$345.00 per hour, totaling \$517.50.

Payment Detail

<u>Date</u>	<u>Description</u>	<u>Amount</u>
02/21/2021	Check Number 57771 against Inv# 28790	(\$927.50)
Total Payments Received:		(\$927.50)

Prior Balance:	\$927.50	Last Payment:	02/21/2021
Payments Received:	(\$927.50)		
Current Fees:	\$5,208.00		
Advanced Costs:	<u>\$0.00</u>		
TOTAL AMOUNT DUE:	\$5,208.00		

Thank You for Letting Us Serve You.
 Payment Due Upon Receipt.
 Please call John H. Bedard, Jr. with any questions
 you may have. 678-253-1871ext. 244

EXHIBIT

“B”

Matter History Report

Report Date: 3/24/2021
 Report Time: 9:06AM
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 User ID: Bedard

Bedard Law Group, P.C.

Client Number: SANAA000MQ - Aristotle Sangalang
Matter Number: 4580- The Bureaus, Inc. v. Harris, Danielle
Matter Type: FDCPA Defense Litigation
Date Range: 01/01/2019 Thru 03/24/2021
Billing Mode: Hourly

Ticket #	Date	Timekeeper	Description	Time Spent	Amount
FEES					
1	02/20/2020	JA	Review/analyze complaint.	0.30	\$79.50
2	02/21/2020	JA	Review/analyze client documents.	0.30	\$79.50
3	02/21/2020	JA	Attempted telephone conference with client re: facts of case. Left message to call.	0.10	No Charge
4	02/21/2020	JA	Telephone conference with client re: facts and strategy.	0.70	\$185.50
5	02/21/2020	JA	Draft/revise release. Draft/revise memo to client re: same.	0.20	\$53.00
6	02/24/2020	JA	Review/analyze memo from client re: release edits. Draft/revise memo to client re: same.	0.10	\$26.50
7	02/25/2020	JA	Review/analyze memo from client re: settlement. Draft/revise memo to client re: same.	0.10	\$26.50
8	02/25/2020	JA	Draft/revise memo to opposing counsel re: settlement.	0.10	\$26.50
9	02/27/2020	JA	Draft/revise memo to client re: settlement and answer.	0.10	\$26.50
10	02/27/2020	JA	Draft/revise answer and corporate disclosure statement.	0.90	\$238.50
11	03/23/2020	JA	Review/analyze Court's Order re COVID-19.	0.10	\$26.50
12	03/25/2020	JA	Draft/revise memo to opposing counsel re: joint preliminary report and rule 26 conference.	0.10	\$26.50
13	03/25/2020	JA	Review/analyze client documents.	0.20	\$53.00
14	03/25/2020	JA	Draft/revise initial disclosures.	0.30	\$79.50

Matter History Report

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Bedard Law Group, P.C.

Ticket #	Date	Timekeeper	Description	Time Spent	Amount
15	03/25/2020	JA	Draft/revise memo to client re: initial disclosures and discovery.	0.10	\$26.50
16	03/26/2020	JA	Review/analyze memo from client re: initial disclosures. Draft/revise memo to client re: discovery.	0.10	\$26.50
17	03/27/2020	JA	Draft/revise initial disclosures.	0.10	\$26.50
18	03/27/2020	JA	Telephone conference with opposing counsel re: Rule 26 Conference.	0.10	\$26.50
19	03/30/2020	JA	Draft/revise joint preliminary report.	0.30	\$79.50
20	04/02/2020	JA	Review/analyze [10] Scheduling Order.	0.10	\$26.50
21	04/17/2020	JA	Review/analyze plaintiff's first set of discovery requests. Draft/revise memo to client re: same.	0.10	\$26.50
22	04/22/2020	JA	Draft/revise discovery responses.	0.50	\$132.50
23	04/22/2020	JA	Draft/revise discovery requests.	0.40	\$106.00
24	04/23/2020	JA	Review/analyze memo from opposing counsel re: discovery. Draft/revise memo to opposing counsel re: same.	0.10	\$26.50
25	05/13/2020	JA	Draft/revise memo to client re: discovery responses.	0.10	\$26.50
26	05/15/2020	JA	Telephone conference with client re: discovery responses.	0.40	\$106.00
27	05/15/2020	JA	Draft/revise discovery responses.	1.00	\$265.00
28	05/18/2020	JA	Draft/revise memo to client re: discovery responses.	0.10	\$26.50
29	05/18/2020	JA	Draft/revise discovery responses.	0.30	\$79.50
30	05/21/2020	JA	Review/analyze discovery responses.	0.30	\$79.50
31	05/27/2020	JA	Draft/revise memo to client re: plaintiff's discovery responses.	0.40	\$106.00
32	06/04/2020	JA	Review/analyze [REDACTED] [REDACTED]	0.60	\$159.00

Matter History Report

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Bedard Law Group, P.C.

Ticket #	Date	Timekeeper	Description	Time Spent	Amount
33	06/04/2020	JA	Draft/revise memo to client re: [REDACTED] [REDACTED]	0.20	\$53.00
34	06/22/2020	JA	Review/analyze plaintiff's discovery responses.	0.10	\$26.50
35	06/22/2020	JA	Draft/revise memo to opposing counsel re: deposition.	0.10	\$26.50
36	07/13/2020	JA	Review/analyze memo from opposing counsel re: plaintiff's deposition. Draft/revise memo to opposing counsel re: same.	0.10	\$26.50
37	07/14/2020	JA	Review/analyze memo from opposing counsel re: deposition. Draft/revise memo to client re: same.	0.10	\$26.50
38	07/14/2020	JA	Review/analyze memo from opposing counsel re: deposition. Draft/revise memo to opposing counsel re: same.	0.10	\$26.50
39	07/16/2020	JA	Draft/revise memo to opposing counsel re: deposition.	0.10	\$26.50
40	07/17/2020	JA	Draft/revise memo to opposing counsel re: plaintiff's deposition.	0.10	\$26.50
41	07/17/2020	JA	Telephone conference with client re: depositions.	0.30	\$79.50
42	07/17/2020	JA	Telephone conference with court reporter remote deposition.	0.40	No Charge
43	07/17/2020	JA	Draft/revise notice of plaintiff's deposition.	0.30	\$79.50
44	07/19/2020	JA	Draft/revise plaintiff deposition outline.	3.20	\$848.00
45	07/20/2020	JA	Attend deposition of plaintiff.	2.00	\$530.00
46	07/20/2020	JA	Review/analyze documents to prepare for plaintiff's deposition.	0.60	\$159.00
47	07/20/2020	JA	Draft/revise memo to client re: amended discovery responses and plaintiff's deposition.	0.30	\$79.50
48	07/20/2020	JA	Draft/revise amended discovery responses.	1.00	\$265.00

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Bedard Law Group, P.C.

Ticket #	Date	Timekeeper	Description	Time Spent	Amount
49	07/20/2020	JA	Telephone conference with client re: plaintiff's deposition.	0.30	\$79.50
50	07/21/2020	JA	Review/analyze memo from client re: discovery responses. Draft/revise memo to client re: same.	0.10	\$26.50
51	07/21/2020	JA	Draft/revise amended discovery responses.	0.30	\$79.50
52	08/04/2020	JA	Review/analyze memo from court reporter re: exhibits. Draft/revise memo to court reporter re: same.	0.10	\$26.50
53	08/06/2020	JA	Review/analyze plaintiff's deposition transcript.	0.80	\$212.00
54	08/06/2020	JA	Draft/revise memo to client re: summary judgment and deposition transcript.	0.30	\$79.50
55	08/06/2020	JA	Review/analyze memo from client re: consumer debt. Draft/revise memo to client re: same.	0.10	\$26.50
56	08/16/2020	JA	Draft/revise statement of undisputed material facts.	2.00	\$530.00
57	08/17/2020	JA	Draft/revise motion for summary judgment.	2.10	\$556.50
58	08/18/2020	JA	Draft/revise motion for summary judgment.	1.40	\$371.00
59	08/24/2020	JA	Telephone conference with client re: summary judgment.	0.30	\$79.50
60	08/24/2020	JA	Research case law re: standing argument.	0.90	\$238.50
61	08/24/2020	JA	Draft/revise motion for summary judgment.	1.50	\$397.50
62	08/25/2020	JA	Conference with D. Kleber re: standing cases in the 11th Circuit.	0.50	No Charge
63	08/25/2020	JA	Draft/revise client declaration for motion for summary judgment.	1.40	\$371.00
64	08/25/2020	JA	Draft/revise motion for summary judgment.	1.90	\$503.50

Matter History Report

Report Date: 3/24/2021
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 User ID: Bedard

Bedard Law Group, P.C.

Ticket #	Date	Timekeeper	Description	Time Spent	Amount
65	08/26/2020	JA	Draft/revise motion for summary judgment.	6.20	\$1,643.00
66	09/16/2020	JA	Attempted telephone conference with client re: plaintiff's dismissal request. Left message to call.	0.10	No Charge
67	09/16/2020	JA	Telephone conference with client re: dismissal request.	0.50	\$132.50
68	09/16/2020	JA	Conference with M. Chapman re: judgment in other Gary Nitzkin case.	0.30	No Charge
69	09/16/2020	JA	Review/analyze memo from opposing counsel re: dismissal. Draft/revise memos to client and opposing counsel re: same.	0.60	\$159.00
70	09/17/2020	JA	Review/analyze plaintiff's response to summary judgment. Draft/revise memo to client re: same.	0.30	\$79.50
71	09/22/2020	JA	Review/analyze plaintiff's response to summary judgment and motion to dismiss. Draft/revise memo to client re: same.	0.20	\$53.00
72	09/30/2020	JA	Draft/revise reply brief in support of motion for summary judgment and response to motion to dismiss.	2.50	\$662.50
73	10/01/2020	JA	Draft/revise response to motion to dismiss.	0.40	\$106.00
74	10/01/2020	JA	Draft/revise memo to client re: reply and response briefs.	0.10	\$26.50
75	12/01/2020	JA	Review/analyze notice of appearance of new counsel. Draft/revise memo to client re: same.	0.10	\$26.50
76	12/10/2020	JA	Review/analyze motion to withdraw as counsel. Draft/revise memo to client re: same.	0.10	\$26.50
77	12/18/2020	JA	Review/analyze memo from client re: motion to substitute counsel. Draft/revise memo to client re: same.	0.10	\$26.50
78	12/21/2020	JA	Review/analyze order on motion to withdraw as counsel. Draft/revise memo to client re: same.	0.10	\$26.50

Matter History Report

Report Date: 3/24/2021
 Report Time: 9:06AM
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 User ID: Bedard

Bedard Law Group, P.C.

Ticket #	Date	Timekeeper	Description	Time Spent	Amount
79	12/29/2020	JA	Review/analyze magistrate judge's report and recommendation. Draft/revise memo to client re: same.	0.30	\$79.50
80	01/12/2021	JA	Review/analyze plaintiff's objection to the report and recommendation and motion for leave to amend. Draft/revise memo to client re: same.	0.30	\$79.50
81	01/15/2021	JA	Review/analyze court order re: motion for summary judgment. Draft/revise memo to client re: same.	0.30	\$79.50
82	01/26/2021	JA	Draft/revise memo to client re: status of case.	0.10	\$26.50
83	01/26/2021	JA	Telephone conference with client re: sanction motion.	0.40	\$106.00
84	01/28/2021	JA	Research case law re: bad faith motion for attorney's fees.	2.40	\$636.00
85	02/01/2021	JA	Research case law in support of motion for attorneys fees.	0.60	\$159.00
86	02/01/2021	JA	Draft/revise motion for attorneys fees.	1.10	\$291.50
87	02/02/2021	JA	Draft/revise motion to attorney's fees.	3.30	\$874.50
88	02/03/2021	JA	Draft/revise memo to client re: request for attorney's fees from opposing counsel.	0.10	\$26.50
89	02/03/2021	JA	Research bad faith under the FDCA.	0.50	\$132.50
90	02/03/2021	JA	Draft/revise motion for attorneys fees.	2.10	\$556.50
91	02/04/2021	JA	Draft/revise motion for attorney's fees.	3.60	\$954.00
92	02/11/2021	JA	Review/analyze dockets for number of cases filed by CRLA.	1.00	\$265.00
93	02/15/2021	JB	Draft/revise brief in support of motion for sanctions and costs.	1.50	\$517.50
94	02/15/2021	JA	Draft/revise bill of cost.	0.20	\$53.00
95	02/15/2021	JA	Draft/revise motion for sanctions.	1.50	\$397.50

Matter History Report

Report Date: 3/24/2021
 Report Time: 9:06AM
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 User ID: Bedard

Bedard Law Group, P.C.

Ticket #	Date	Timekeeper	Description	Time Spent	Amount
96	02/16/2021	JA	Draft/revise bill of cost.	0.20	\$53.00
97	02/21/2021	JA	Draft/revise sanction motion.	0.20	\$53.00
98	02/22/2021	JA	Draft/revise motion for sanctions.	3.30	\$874.50

**SUMMARY - By Time Ticket
Type**

Billable:	64.90	\$17,318.50
Trial:	0.00	\$0.00
Flat Charge:	0.00	\$0.00
Non-Billable:	0.00	\$0.00
No Charge:	1.40	\$0.00
isc No Charge:	0.00	\$0.00
Total:	66.30	\$17,318.50

SUMMARY - By Timekeeper

JA	Billable Timekeeper Hours & Fees. .	63.40	\$16,801.00
JB	Billable Timekeeper Hours & Fees. .	1.50	\$517.50
JA	No Charge Hours	1.40	\$0.00
	Misc. Fee Debits & Credits.	-	\$0.00
Total:		66.30	\$17,318.50

	Billed Amount	Payment Amount	Amount Due
Fees:	\$17,318.50	(\$12,110.50)	\$5,208.00
Hard Costs:	\$0.00	\$0.00	\$0.00
Soft Costs:	\$0.00	\$0.00	\$0.00
Taxes:	\$0.00	\$0.00	\$0.00
Late Charges:	\$0.00	\$0.00	\$0.00
Totals:	\$17,318.50	(\$12,110.50)	\$5,208.00

Date of Last Payment: 02/21/2021

Date of Last Bill: 03/01/2021

EXHIBIT

“C”

Matter Billing Detail

Report Date: 3/24/2021
 Report Time: 9:03AM
 Page: 1 of 3
 User ID: Bedard

Bedard Law Group, P.C.**Date Range:** 01/01/2019 to 03/24/2021**Client:** SANAA000MQ - Aristotle Sangalang**Matter:** 4580 - The Bureaus, Inc. v. Harris, Danielle

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
		Balance Forward:	\$0.00						
03/01/2020	FEE	Fees Billed on Invoice #: 26974	\$742.00		Billed		26974		
03/22/2020	FPD	Check Number 56326 against Inv# 26974		\$742.00	Billed		27127		
04/01/2020	FEE	Fees Billed on Invoice #: 27127	\$371.00		Billed		27127		
04/17/2020	FPD	Check Number 56453 against Inv# 27127		\$371.00	Billed		27283		
05/01/2020	FEE	Fees Billed on Invoice #: 27283	\$318.00		Billed		27283		
05/20/2020	FPD	Check Number 56587 against Inv# 27283		\$318.00	Billed		27457		
06/01/2020	FEE	Fees Billed on Invoice #: 27457	\$689.00		Billed		27457		
06/23/2020	FPD	Check Number 56687 against Inv# 27457		\$689.00	Billed		27607		
07/01/2020	FEE	Fees Billed on Invoice #: 27607	\$265.00		Billed		27607		
07/19/2020	FPD	Check Number 56787 against Inv# 27607		\$265.00	Billed		27781		
08/01/2020	FEE	Fees Billed on Invoice #: 27781	\$2,358.50		Billed		27781		
08/22/2020	FPD	Check Number 56938 against Inv# 27781		\$2,358.50	Billed		27933		
09/01/2020	FEE	Fees Billed on Invoice #: 27933	\$5,035.00		Billed		27933		
09/12/2020	FPD	Check Number 57052 against Inv# 27933		\$5,035.00	Billed		28113		
10/01/2020	FEE	Fees Billed on Invoice #: 28113	\$1,086.50		Billed		28113		
10/14/2020	FPD	Check Number 57223 against Inv# 28113		\$1,086.50	Billed		28284		
11/01/2020	FEE	Fees Billed on Invoice #: 28284	\$132.50		Billed		28284		
12/19/2020	FPD	Check Number 57453 against Inv# 28284		\$132.50	Billed		28586		
01/01/2021	FEE	Fees Billed on Invoice #: 28586	\$185.50		Billed		28586		
01/16/2021	FPD	Check Number 57574 against Inv# 28586		\$185.50	Billed		28790		
02/01/2021	FEE	Fees Billed on Invoice #: 28790	\$927.50		Billed		28790		
02/21/2021	FPD	Check Number 57771 against Inv# 28790		\$927.50	Billed		28966		
03/01/2021	FEE	Fees Billed on Invoice #: 28966	\$5,208.00		Billed		28966		
03/05/2021	Tmtk	Review/analyze memo from opposing counsel re: response motion extension. Draft/revise memo to opposing counsel re: same.	\$26.50		Unbilled				

Matter Billing Detail

Report Date: 3/24/2021
 Report Time: 9:03AM
 Page: 2 of 3
 User ID: Bedard

Bedard Law Group, P.C.

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
03/08/2021	Tmtk	Draft/revise memo to client re: communication from opposing counsel.	\$26.50		Unbilled				
03/08/2021	Tmtk	Review/analyze sanction order against CRLA in another case.	\$53.00		Unbilled				
03/08/2021	Tmtk	Telephone conference with opposing counsel re: fee motion.	\$53.00		Unbilled				
03/08/2021	Tmtk	Telephone conference with client re: conference call with opposing counsel.	\$26.50		Unbilled				
03/15/2021	Tmtk	Review/analyze plaintiff's response to motion for attorney's fee and cases cited therein.	\$318.00		Unbilled				
03/19/2021	Tmtk	Draft/revise memo to client re: same.							
03/19/2021	Tmtk	Review/analyze cases cited by plaintiff in response motion.	\$132.50		Unbilled				
03/19/2021	Tmtk	Research case law for attorney fee reply brief.	\$212.00		Unbilled				
03/19/2021	Tmtk	Draft/revise reply to sanction motion.	\$318.00		Unbilled				
03/22/2021	Tmtk	Draft/revise reply brief in support of motion for attorneys fees.	\$132.50		Unbilled				
03/22/2021	Tmtk	Draft/revise affidavit in support of motion for attorney's fees.	\$79.50		Unbilled				
03/22/2021	Tmtk	Draft/revise reply brief to Plaintiff's opposition to Defendant's motion for attorney fees and costs.	\$207.00		Unbilled				
03/22/2021	Tmtk	Draft/revise affidavit re: motion for attorney's fees.	\$106.00		Unbilled				
03/23/2021	Tmtk	Draft/revise reply brief and affidavit in support.	\$371.00		Unbilled				
03/24/2021	Tmtk	Draft/revise affidavit of John H. Bedard, Jr.	\$276.00		Unbilled				
Total:			<u>\$19,656.50</u>						
Balance:			<u>\$7,546.00</u>						
				<u>\$12,110.50</u>					

Matter Billing Detail

Report Date: 3/24/2021
 Report Time: 9:03AM
 Page: 3 of 3
 User ID: Bedard

Bedard Law Group, P.C.

Date	Expense Code	Description	Debit	Credit	Billing Status	On Hold	Invoice Number	Check Number	Payee
Total Fees Billed- - - - -			\$17,318.50						
Total Fees Unbilled : - - - - -			\$2,338.00						
Total Fees Received : - - - - -			(\$12,110.50)						
Total Soft Cost Billed : - - - - -			\$0.00						
Total Soft Cost Unbilled : - - - - -			\$0.00						
Total Soft Cost Received : - - - - -			\$0.00						
Total Hard Cost Billed : - - - - -			\$0.00						
Total Hard Cost Unbilled : - - - - -			\$0.00						
Total Hard Cost Received : - - - - -			\$0.00						
Total Taxes Billed : - - - - -			\$0.00						
Total Taxes Unbilled : - - - - -			\$0.00						
Total Taxes Received : - - - - -			\$0.00						
Total Late Charges Billed : - - - - -			\$0.00						
Total Late Charges Unbilled: - - - - -			\$0.00						
Total Late Charges Received : - - - - -			\$0.00						
Trust Balance: - - - - -			\$0.00						